

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SNS BANK N.V., and SNS GLOBAL  
CUSTODY B.V.,

Defendants.

Adv. Pro. No. 12-01046 (SMB)

**STIPULATION EXTENDING TIME TO RESPOND  
AND ADJOURNING THE PRE-TRIAL CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendants SNS Bank N.V. and SNS Global Custody B.V. (together, “Defendants”) may move, answer, or otherwise respond to the Trustee’s complaint (“Complaint”) is extended up to and including October 22, 2014. The pre-trial conference will be adjourned from October 22, 2014, at 10:00 a.m. to December 17, 2014, at 10:00 a.m.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for Defendants to move against, answer, or otherwise respond to the Complaint. Nothing in this

Stipulation is a waiver of Defendants' right to request from the Court a further extension of time to move against, answer, or otherwise respond to the Complaint and/or the Trustee's right to object to any such request.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction and any rights regarding any pending motion.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: August 7, 2014  
New York, New York

/s/ Thomas L. Long  
**BAKER & HOSTETLER LLP**  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Thomas L. Long  
Email: tlong@bakerlaw.com  
Mark A. Kornfeld  
Email: mkornfeld@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and Bernard L. Madoff*

/s/ George W. Shuster, Jr.

**WILMER CUTLER PICKERING**

**HALE AND DORR LLP**

7 World Trade Center

250 Greenwich Street

New York, New York 10007

Telephone: (212) 230-8800

Facsimile: (212) 230-8888

George W. Shuster, Jr.

Email: [george.shuster@wilmerhale.com](mailto:george.shuster@wilmerhale.com)

*Attorneys for SNS Bank N.V. and SNS  
Global Custody B.V.*